

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BECTON, DICKINSON AND COMPANY,
GENEOHM SCIENCES CANADA, INC.
and HANDYLAB, INC.,

Plaintiffs,

C.A. No. 19-cv-1126-LPS

v.

NEUMODX MOLECULAR, INC.,
QIAGEN GMBH, QIAGEN NORTH
AMERICAN HOLDINGS, INC.,
SUNDARESH
BRAHMASANDRA, and JEFFREY
WILLIAMS,

Defendants.

**DEFENDANTS JEFFREY WILLIAMS AND SUNDARESH BRAHMASANDRA’S
MOTION TO DISMISS PURSUANT TO RULE 12(B)(3) FOR LACK OF VENUE**

Pursuant to Federal Rule 12(b)(3), Defendants Jeffrey Williams and Sundaresh Brahmasandra move to dismiss for improper venue recently the filed “Counterclaims-In-Reply” Count Nos. 1, 2 and 7-10 asserted against one or both of them for alleged trade secret misappropriation, breach of contract, and other torts. Defendants Williams and Brahmasandra respectfully request that the Court dismiss Counts 1, 2 and 7-10 against them, and that the Court dismiss them as parties from this lawsuit because there is no venue over them in Delaware. This motion is accompanied by an opening describing the basis for the requested relief.

Dated: May 13, 2021

Of Counsel:

DICKINSON WRIGHT
James K. Cleland
Michael N. Spink
Keith Weiss
350 S. Main Street, Suite 300
Ann Arbor, Michigan 48104
Tel. 734.302.6000
jcleland@dickinsonwright.com
mspink@dickinsonwright.com
kweiss@dickinsonwright.com

Respectfully submitted,

FARNAN LLP

/s/ Brian E. Farnan
Brian E. Farnan (Bar No. 4089)
Michael J. Farnan (Bar No. 5165)
919 North Market Street
12th Floor
Wilmington, DE 19801
Telephone: (302) 777-0300
Facsimile: (302) 777-0301
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

*Attorneys for Defendants Jeffrey Williams
and Sundaresh Brahmasandra*